Responses to Plymouth’s Waste Development Plan Document -
Additional comments December 2007

There are a significant number of areas within these proposals that indicate weaknesses and inconsistencies in terms of other local bodies and indeed with the stated aims of the Plymouth City Council itself – these include environmental, health and transport issues and have already seen some discussion in the commentary listed on the Tests of Soundness, and will be addressed elsewhere in the Hearing. However, there are a number of particular aspects that directly relate to interaction with other agencies.

One of the major concerns must be with the level of consultation that has been undertaken in this exercise – without this, how can the plans and objectives of other agencies possibly be addressed? The lack of full consultation is clearly highlighted in the comments that have subsequently been received from adjacent councils and the Tamar AONB in the closing stages of the consultation procedure and reported in the local press. Similarly the comments raised indicate a clear lack of consultation with local residents; in both cases this does not concur with the guideline laid out by the RDA (p11) that local authorities should work, *inter alia*, with each other and with local residents. This indicates a failure of the documentation under Test 2a.

There must also be concerns that the proposals listed are inadequate in terms of Best Practicable Environmental Option as laid out in Government guidelines (Planning for Sustainable Waste Management, ODPM, 2002) and advocated by the RDA. It is clear that environmental analyses on the options are patchy – for instance, an air pollution impact assessment has been carried out for one site (Coypool) but not for others including one (Ernesettle) which is under consideration for similar site usage. As mentioned elsewhere, this site is subject to thermal inversions and valley fogs which have been linked to pollution problems at a number of sites worldwide. A photo showing fog development in the vicinity of the proposed Ernesettle development is enclosed.

Similarly there is no evidence of comprehensive biodiversity assessments on all sites, nor full account of local environmentally sensitive areas. This is perhaps especially noteworthy in light of a recent decision by a Cornish planning committee to reject a proposal to upgrade an existing greenwaste composting site to a municipal composting site on grounds of environmental impacts (Cornwall County Council; Proposed ‘in-vessel’ composting facility and associated works at Downs farm, Bell Lake, Coombe, near Camborne, 19.4.2007; accessible at http://db.cornwall.gov.uk/documents/download.aspx?doc=148140

In addition IPPC guidance (Environment Agency, 2003) requires that detailed dispersion modelling must be carried out based on sensitive receptors including sites of special scientific interest (SSSI), special protection areas (SPA) or special areas of conservation (SAC) within 10 km of the installation; this is not achieved.
It is also worth noting that the City Council expressed concern that the Coypool site might not be available for its projected usage, but the current site users, Imerys, have now confirmed their opinion that the site would be suitable for its projected uses (Limehouse consultation response 21) and have recently confirmed their intention to close their operations on the site in the near future. (Plymouth Herald, 8th November 2007). These observations indicate a failure of tests 3, 7 and 8 in the Waste DPD.

The major problem nevertheless perhaps lies in the consideration of all alternative sites. Reference is made in the documentation to limited continued use of part of the landfill site at Chelston, but although it will not be available for further landfill it is unclear why other operations such as composting, anaerobic digestion, incineration and recycling operations cannot be continued on this clearly brownfield site. In contrast there has been recent publicity of an intention to turn this area into a new parkland – trying to convert an existing brownfield site into a greenfield one??

A further omission must be recognised in relation to collaboration between local authorities and the development of the new power station site at Langage. This development includes a gas-fired power station and associated industrial park. The site is just outside the city limits but could also serve a new town development at Sherford. As indicated above, the RDA guidelines advocate that local authorities should work together and Plymouth City Council, in their Waste management Strategy 2007-2030 para 2.8.7 (April 2007), acknowledge that as a Unitary Authority, the city is well placed to work with other authorities within the South West, and that they should consider a joint approach with other authorities.

Langage would seem to present a logical alternative site and meets with RDA guidelines in the Regional Spatial Strategy Policy P10.1 and P10.2. This opportunity was not advanced in the original 2005 proposals as the development had not received planning approval at that time, but was subsequently proposed by a respondent. As mentioned elsewhere, it was dismissed in the current proposals on the grounds that the site is outside the city limits. However, with suggestions that a waste to power plant serving Plymouth could receive inputs from the South Hams and Torbay, on a proximity principle the Langage site would offer advantages over all the sites currently under consideration. Moreover it offers an existing effective generation and distribution system and is close to existing rail and road links. None of the sites currently under consideration have appropriate gas and electricity supplies on site and their installation must present additional environmental impacts.

As the site operators, Centrica, have expressed a wish to diversify into renewable energy systems it would seem foolish in the extreme and a real opportunity lost not to explore this option further. This indicates a failure of tests 4b and 7.